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Counsel for Debtor

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re

CASH CLOUD, INC.,
dba COIN CLOUD,

Debtor.

Case No. BK-23-10423-mkn

Chapter 11

**SUPPLEMENTAL VERIFIED
STATEMENT OF
ROBERT A. MUSIALA, JR. IN
FURTHER SUPPORT OF
APPLICATION FOR ORDER
AUTHORIZING RETENTION AND
EMPLOYMENT OF BAKER &
HOSTETLER LLP AS REGULATORY
COUNSEL TO DEBTOR**

Hearing Date: May 5, 2023

Hearing Time: 10:00 AM PST

I, Robert A. Musiala, Jr., being duly sworn, deposes and declares under the penalty of perjury:

1. I am over 18 years of age, and am competent to testify as to the matters set forth in this Supplemental Verified Statement (“Supplemental Verified Statement”) based upon my own personal knowledge and if called upon to testify, could and would do so.

2. I make this Supplemental Verified Statement in further support of the *Application for Order Authorizing Retention and Employment of Baker & Hostetler LLP as Regulatory Counsel to Debtor* (the “B&H Application”) (ECF Docket No. 449),¹ filed by Cash Cloud, Inc., dba Coin Cloud (“Debtor”). The chapter 11 case of Debtor is referred to herein as the “Chapter 11 Case.”

3. I am an attorney and partner at Baker & Hostetler LLP (“B&H”).

4. On April 24, 2023, Debtor filed the B&H Application contemporaneously with my *Verified Statement* in support of the B&H Application (the “Verified Statement”) (ECF Docket No. 450) and the *Declaration of Chris McAlary* (the “McAlary Declaration”) (ECF Docket No. 451).

5. On April 24, 2023, Debtor filed the *Ex Parte Application For Order Shortening Time For Hearing* (the “Application”) on the B&H Application (ECF Docket No. 452). On April 25, 2023, the Court granted the Application and scheduled a hearing on the B&H Application for May 18, 2023 (ECF Docket No. 468).

6. On April 27, 2023, Debtor filed an *Amended Ex Parte Application For Order Shortening Time For Hearing* on the B&H Application (ECF Docket No. 477) (the “Amended Application”). On April 28, 2023, the Court granted the Amended Application and scheduled a hearing on the B&H Application for May 5, 2023.

7. As discussed in the Verified Statement, B&H conducted a thorough search using its computerized conflicts check system, based on the information received to date from Debtor, and provided, as Exhibit 3 to the Verified Statement, a list of parties that B&H currently or formerly represents or has a litigation or transactional adversity to the creditors of Debtor. Further, to the extent that B&H discovered any adverse, material relationships during the period of B&H’s retention, B&H stated that it would supplement the Verified Statement.

8. After the filing of the B&H Application, Debtor filed a *Notice of Designated Stalking Horse Bidder*, reflecting the designated Stalking-Horse Bidder as RockitCoin, LLC (ECF Docket No. 473). B&H represents RockitCoin, LLC in matters unrelated to this Chapter 11 Case and does not represent RockitCoin, LLC in connection with Debtor’s case. Accordingly, B&H is filing this

¹ Capitalized terms not defined herein shall have the meanings ascribed to them in the B&H Application.

1 Supplemental Verified Statement and attaching a supplemental Exhibit 1 “Disclosure of
2 Relationships”.

3 I declare, under penalty of perjury of the laws of the United States of America, that the
4 foregoing statements are true and correct to the best of my knowledge, information and belief.

5 Executed this 4th day of May 2023 in Chicago, Illinois.

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7 /s/Robert A. Musiala, Jr.

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EXHIBIT 1

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EXHIBIT 1**Supplemental Disclosure of Relationships**

Baker & Hosteler LLP (“B&H”) currently represents the following creditors or has a current adversity in matters unrelated to Debtor or the Chapter 11 Case:

<u>Client/Party</u>	<u>Relationship to Debtor</u>	<u>Matter</u>
Chevron	Creditor	B&H represents Chevron in matters unrelated to this Chapter 11 Case and does not represent Chevron in connection with this Case.
Avtech Corp.	Creditor	B&H represents Avtech in matters unrelated to this Chapter 11 Case and does not represent Avtech Corp. in connection with this Case.
Securitas Security Services USA Inc	Creditor	B&H represents Securitas Security Services USA Inc in matters unrelated to this Chapter 11 Case and does not represent Securitas Security Services USA Inc in connection with this Case.
iHeartMedia, Inc.	Creditor	B&H represents iHeartMedia, Inc. in matters unrelated to this Chapter 11 Case and does not represent iHeartMedia, Inc. in connection with this Case.
Cox Business	Creditor	B&H represents Cox Business in matters unrelated to this Chapter 11 Case and does not represent Cox Business in connection with this Case.
EG America LLC	Creditor	B&H represented EG America LLC in matters unrelated to this Chapter 11 Case and does not represent EG America LLC in connection with this Case.

Simon Property Group, Inc.	Creditor	B&H represents Simon Property Group, Inc. in matters unrelated to this Chapter 11 Case and does not represent Simon Property Group, Inc. in connection with this Case.
U.S. Securities and Exchange Commission – Fair Fund Program	Creditor	B&H represents the U.S. Securities and Exchange Commission, Fair Fund Program in matters unrelated to this Chapter 11 Case and does not represent the U.S. Securities and Exchange Commission in connection with this Case.
RockitCoin, LLC	Designated Stalking Horse Bidder	B&H represents RockitCoin, LLC in matters unrelated to this Chapter 11 Case and does not represent RockitCoin, LLC in connection with this Case.

(THE B&H CONFLICT RESOLUTION PROCEDURE IS ONGOING, AND B&H WILL UNDERTAKE TO SUPPLEMENT THIS DECLARATION AS NECESSARY)